

ZMO LAW PLLC

December 7, 2024

Submitted via ECF and email

Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *U.S. v. Kenyatta Taiste*, 18 Cr. 684 (VM)

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DATE FILED: <input type="text" value="12/10/2024"/>

Dear Judge Marrero:

This office previously represented the defendant, Kenyatta Taiste, in the above-captioned matter pursuant to an appointment under the Criminal Justice Act. Ms. Taiste pled guilty on December 18, 2019 pursuant to a plea agreement and was sentenced on August 5, 2022. My representation of Ms. Taiste ended shortly thereafter.

However, on November 22, 2024, I was contacted by the Department of Probation, which informed me that they had recently submitted an early termination request based upon Ms. Taiste's compliance with supervision and her continued progress. It is my understanding that the Government is opposing Probation's application absent a more thorough justification for the "extraordinary" remedy. Probation asked if we would work with Ms. Taiste to submit the necessary materials for both the Government and the Court to consider.

Accordingly, I request that the Court re-appoint me and my managing attorney, Victoria Medley (who was also previously appointed to this case as my Associate) for the limited purpose of assisting Ms. Taiste in gathering and submitting materials in support of Probation's application for early termination of supervision. Ms. Medley's assistance will allow for more efficient and economical representation, as she took the lead in drafting the sentencing memorandum and has stayed in touch with Ms. Taiste over the years. Therefore, I request that she be appointed at the CJA Associate rate of \$137.60 per hour. With Ms. Medley's assistance, I anticipate spending no more than 1.5 hours on the instant matter. I also request that the appointment of myself and Ms. Medley be made *nunc pro tunc* to November 22, 2024, when Probation first contacted me regarding Ms. Taiste.

ZMO LAW PLLC

Thank you for your attention to this case.

Very truly yours,

Zachary Margulis-Ohnuma

CC: Nicholas Chiuchiolo (via ECF and email)

Request GRANTED.

The Court hereby re-appoints Mr. Margulis-Ohnuma as CJA counsel and Ms. Medley as CJA associate counsel for the limited purpose of assisting Ms. Taiste in gathering and submitting materials in support of Probation's application for early termination of supervision. This appointment is effective *nunc pro tunc* to November 22, 2024.

SO ORDERED.

10 December 2024

DATE



VICTOR MARRERO, U.S.D.J.